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December 24, 2024

VIA ECF

Hon. J. Paul Oetken, U.S.D.J.
United States District Court, Southern District of New York
Room 2101
40 Foley Square
New York, NY 10007

Re: Alondra Rivera v. Target Corporation, et al., Docket No. 1:24-cv-06965

Dear Judge Oetken:

We represent Target Corporation and all individual defendants in the above matter. Consistent with Your Honor's Individual Rules and Practices, we respectfully submit this letter motion to request an extension of time to answer or otherwise respond to the Complaint filed by Alondra Rivera as against individual defendant Kelly Roque. Based on the November 1, 2024 date of acceptance of service through the US Marshal's Office, Ms. Roque's deadline to answer or otherwise respond to the Complaint is January 2, 2025. Target and the remaining individual defendants acknowledged service on November 26, 2024 and have a deadline of January 27, 2025 to respond.

We require additional time to respond on behalf of Ms. Roque, particularly due to limited availability of key individuals resulting from holiday schedules, and, in the interest of efficiency and judicial economy, we intend to prepare one complete response on behalf of all defendants. Accordingly, we respectfully request an extension of 25 days, to January 27, 2025, to answer or otherwise respond to the Complaint on behalf of Ms. Roque, at which time we will respond on behalf of all defendants.

We contacted Plaintiff, Alondra Rivera, who is proceeding *pro se*, via email on December 20 to request her consent to an extension. Ms. Rivera responded on December 22, 2024 and did not give her consent.

This is the first request made by any defendant in this matter for an extension and does not affect any other scheduled dates. This request is made in good faith and not for the purpose of causing undue delay.

We thank the Court for its time and consideration.



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Respectfully,

SEYFARTH SHAW LLP

/s/ Alnisa Bell

Alnisa Bell

Cc: Alondra Rivera (via First Class Mail)

The Letter Motion filed on behalf of the individual defendant Kelly Roque ("Roque") at ECF No. 20 is GRANTED. For the orderly administration of this case, it makes sense to have the response date for all defendants to fall on the same day. Accordingly, the time for Roque to answer or otherwise respond to the Complaint is extended until January 27, 2025.

The parties are reminded that this case has been referred to the undersigned for general pretrial purposes. Thus, all non-dispositive matters should be addressed to the undersigned, not District Judge Oetken.

Roque's counsel is directed to promptly forward a copy of this endorsed letter to the pro se Plaintiff by email.

SO ORDERED.

Dated: 12/24/2024

A handwritten signature in blue ink, appearing to read 'Alnisa Bell', written over the typed name.